REMARKS

Reconsideration and allowance of the above-referenced application are respectfully requested.

Claim amendments are presented herein to obviate the current rejection. No new amendments have been made.

Allowable Subject Matter

The allowability of claims 6 and 12 after being rewritten in independent form and including any intervening features is noted.

Claim Objections

Claims 1, 7, 18, and 21 describe a transmitted message which may include a group identifier and a group membership file. The claims, as amended, recite a group membership file, which may in some variations, include information indicative of client memberships in two or more groups. Data indicative of membership may be updated at the first client if the message contains the group identifier and the group membership file includes client memberships associated with the first client. Therefore, based on the current amendments, the relationship of the group membership files should now be clear.

Claims 18 and 21 have been amended to replace "group member" file with "group membership" file as suggested.

Accordingly, it is respectfully requested that these bases for objection be withdrawn.

35 USC § 112

Claims 1, 7, 13, 21 stand rejected under 35 USC § 112 for including the term "it". The claims have been amended to remove any such references.

Accordingly, it is respectfully requested that this rejection be withdrawn.

35 USC § 102 / 103

Claims 1-5, 7-11, 13-22, and 26 stand rejected under 35 USC § 102 as allegedly being anticipated by Rochberger. Claims 23-25 stand rejected under 35 USC § 103 as allegedly being unpatentable over Rochberger in view of Woodward. These rejections are respectfully traversed.

As suggested in the office action, the independent claims have been amended to clarify what constitutes a client specific payload. Claim 1, as amended, recites transmitting a message to each of a plurality of clients including the first client, the message including a header and a payload, the header including either a group identifier or a client identifier, the payload

including a group membership file including information indicative of client memberships in two or more groups if the header is a group identifier or a client specific payload associated with the client identifier if the header is a client. identifier, updating the data indicative of membership at the first client if the message contains the group identifier and the group membership file includes client memberships associated with the first client, and processing the message at the first client if the message contains a client identifier associated with the first client. Claims 7, 13, and 21 contain similar features.

Rochberger describes an arrangement in which nodes communicating by the Private Network to Network Interface (PNNI) protocol are organized in peer groups (see, inter alia, Rochberger col. 2, lines 8-32). Each of the nodes within the peer group exchanges information with the other members of the group such that all members maintain an identical view of the group (see, inter alia, Rochberger col. 2, lines 35-38). Each node exchanges HELLO packets with its immediate neighbors to determine its neighbor's local state information which includes the identity and peer group membership of the node's immediate neighbors and a status of its links to its neighbors (see, inter alia, Rochberger col. 2, lines 54-58). This state information may subsequently be bundled in one or more PNNI Topology

Statement Elements (PTSEs) which are flooded throughout the peer group by being encapsulated into PNNI Topology State Packets (PTSPS) (see, inter alia, Rochberger col. 2, lines 56-61; col. 3, lines 31-44).

Claim 1, has been amended, to clarify that the messages contain either a header having a client identifier or a group identifier and that the messages are sent to each of the plurality of clients. Rochberger, on the other hand, describes a standard packet-based "one node"-to-"one node" communication protocol in which the packets contain PTSEs which only relate to the state information. There is no suggestion within Rochberger that these packets might be sent to all of the clients and that the packets might contain client specific payloads. Moreover, Rochberger does not suggest that there is a header in the PTSPS that is sent to all of the nodes that specifically identifies one of the nodes and included a payload for processing by the node.

Accordingly, claims 1, 7, 13, and 21 and their respective dependent claims should be allowable.

Concluding Comments

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or

concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicant asks that all claims be allowed. Please apply any charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

Date: (0/28)05

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